

**Cause No. PD-0578-16
IN THE COURT OF CRIMINAL APPEALS
FOR TEXAS**

FILED
COURT OF CRIMINAL APPEALS
11/10/2016
ABEL ACOSTA, CLERK

**EX PARTE
ADAM WAYNE INGRAM**

ON DISCRETIONARY REVIEW FROM THE FOURTH COURT OF
APPEALS, SAN ANTONIO CAUSE NO. 04-15-00459-CR

APPEALED FROM THE 186TH JUDICIAL DISTRICT COURT, BEXAR
COUNTY, TEXAS CAUSE NOS. 2014-CR-3210 & 2015-W-0279

**STATE'S FIRST MOTION FOR
EXTENSION OF TIME TO FILE BRIEF**

TO THE HONORABLE JUDGES OF THE COURT OF CRIMINAL APPEALS:

Now comes the State of Texas, Respondent in the above styled and numbered cause, by and through the undersigned Assistant Criminal District Attorney, pursuant to Rules of Appellate Procedure 38.6 and 10.5, and respectfully requests a brief compassionate extension of the time to file its brief in response. In support of this Motion, the State would show the following:

1. The State's brief is currently due **Wednesday, November 9, 2016**. The State is requesting a **seven (7) day** extension of its briefing deadline which, if granted, would make the State's brief due on **Wednesday, November 16, 2016**.

2. Extension is justified by the workload of the undersigned prosecutor, the important issues of statutory constitutionality presented by this case, and the need to compose a brief which may assist the Court in reaching its decision on the issues presented.
3. This is the State's first motion for extension of a briefing deadline in this case. The State does not anticipate the need for additional extensions.

PRAYER

BY THE FOREGOING REASONS AND AUTHORITIES, the State of Texas respectfully prays this Honorable Court extend the time to file the State's brief to Wednesday, November 9, 2016.

Respectfully Submitted:



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CERTIFICATE OF SERVICE

I, S. Patrick Ballantyne, hereby certify that a true and correct copy of this Motion was transmitted this 9th day of November, 2016, to Donald H. Flanary, III, attorney of record for Appellant, by electronic service through a court-approved eFiling service.



S. Patrick Ballantyne